



Environmental Management System Procedure
for
Identification of Legal and Other Requirements
of the
US Army Garrison (USAG) Baumholder

Revision # 1

14 March 2006

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URS Project No. 43863818

Environmental Management System Documentation of the USAG Baumholder

Document Title:

Environmental Management System (EMS) Procedure for Identification of Legal and Other Requirements of the USAG Baumholder

Kind of Document:

Standard Operating Procedure (SOP) for EMS

Document Unique Identification (UID):

See label provided by Document Control (DOC CON) Officer

Number of EMS Procedure:

EMS_PBH_03

Number of Revision:

Rev. # 1

Update requirements:

This document is an EMS controlled document. It has to be kept updated in order to comply with International Organization for Standardization (ISO) 14001. This document shall be reviewed and revised as necessary or when changes occur. When a revised document is available, this document will be discarded and marked as obsolete in the DOC CON database. The revised document gets a new UID.

Date Document Effective:

10 April 2006

Document POC:

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17 APR 06

References:

- a. Executive Order 13148, Greening the Government through Environmental Leadership.
- b. ISO 14001: 2004, Environmental Management Systems – Specification with Guidance for Use.
- c. EMS-Procedure # EMS_PBH_02 – *Determining the Significant Environmental Aspects of the Activities, Products and Services of the U.S. Army Garrison (USAG) Baumholder*
- d. EMS Procedure # EMS_PBH_05 – *Defining Roles, Responsibility and Authority at the USAG Baumholder*
- e. EMS Procedure # EMS_PBH_09 – *Control of Environmentally Relevant Documents of the USAG Baumholder*

1.1 PURPOSE

The purpose of this procedure is to provide a standard method for identifying and providing access to legal and other requirements applicable to the Garrison's environmental aspects. Implementation of this procedure shall ensure that the applicable legal and other environmental requirements are identified for the Garrison's activities, products, and services, and that these requirements are communicated to Garrison's organizations and employees, including tenant organizations and contractor personnel.

1.2 APPLICABILITY

This procedure applies to all working personnel within the installations of USAG Baumholder.

1.3 DEFINITIONS

Media Manager — An individual who manages and provides overall oversight to one or more media areas. Media managers are not restricted to the Environmental Management Division.

Environmental Aspect — The part of an activity, product, or service that interacts with the environment.

Environmental Impact — Any change to the environment that is caused by an environmental aspect.

Environmental Quality Control Committee (EQCC) — A group of individuals that coordinates the activities of the environmental programs covered in AR 200-1. The EQCC advises the command on environmental priorities, policies, strategies, and programs. EQCC members represent the operational, engineering, planning, resource management, legal, medical, and safety interests of the command, including military installation tenant activities. Establishment of EQCC is required by AR 200-1.

2 PROCEDURE

2.1 ROLES AND RESPONSIBILITIES

Every media manager is responsible for identifying the legal and other environmental requirements pertinent to his/her area of responsibility, for listing the applicable requirements in the Garrison-wide inventory of legal and other requirements, and for keeping this list up-to-date.

The DPW EMO initially supplies the media managers with a database that contains a draft inventory of applicable legal and other requirements (for all media areas) for their review.

Every media manager is responsible for editing this inventory of requirements for their specific area(s) of responsibility, and for notifying the DPW EMO upon the completion of this task (see Appendix A for details on the database use).

Once the initial review is completed, the DPW EMO informs all media managers about how to access the final Garrison-wide legal and other requirements inventory.

Every media manager ensures that access to a copy of the requirements listed under their area of responsibility is guaranteed and that their content is known as far as applicable, not only to the media manager, but also to the affected personnel. Ensuring accessibility may be accomplished by either using web sources, or by keeping hardcopies/electronic copies of the respective requirements (IAW EMS Procedure # EMS_PBH_09 – Document Control). In addition, every media manager keeps the list of the requirements applicable to their media area(s) up-to-date.

The DPW EMO maintains the database used for the inventory, ensures that back-ups of the inventory are available, regularly reviews this EMS procedure, and - upon request - assists the media managers in meeting their responsibilities.

2.2 GARRISON-WIDE INVENTORY OF LEGAL AND OTHER REQUIREMENTS

The Garrison-wide inventory of legal and other requirements consists of a database that contains entries for all environmental requirements that apply for the activities, products and services of the Garrison.

The database is compiled and kept up-to-date in a joint effort of the media managers and the DPW EMO, as described in Section 2.1 of this procedure.

The latest version of the database is available to all media managers for daily use and revision reviews on a shared drive¹. Backups of the database are kept by the DPW EMO.

Every media manager ensures that access to a copy of the requirements listed under their area of responsibility is guaranteed and that their content is known as far as applicable, not only to the media manager, but also to the affected personnel.

¹

2.3 IDENTIFICATION OF PERTINENT REQUIREMENTS

Applicable legal and other requirements are:

- Environmental requirements (such as legislative and regulatory requirements)
- Administrative requirements (such as permits, authorizations, licenses, records)
- Voluntary obligations (such as Department of Defense and Army policies, industry standards, EMS)

Most of these legal and other requirements fall under one of the following categories:

- Final Governing Standards for Germany (GFGS)
- German legislation and regulatory requirements (Federal, State, or H&S)
- US legislation and regulatory requirements
- European legislation and regulatory requirements
- Department of Defense policies and instructions
- Army regulations (e.g. AR 25-400-2, AR 200-1))
- Site specific permits (e.g. wastewater discharge permits, operating permits)
- Authorizations
- Industry standards of practice (e.g. ISO, an up-to-date ANSI and ASTM)
- Internal requirements the Garrison has committed itself to (e.g. EMS policy, ISO 14001)

Sources of environmental regulations and other requirements may include the following:

- Umwelt-Online (www.umwelt-online.de, www.umweltonline.de*)
- Defense Environmental Network and Information Exchange (DENIX)
- IMA-E
- Office of the Staff Judge Advocate (OSJA)
- Professional seminars and conferences
- Media-specific management plans
- Host Nation permits

* At 'www.umweltonline.de' it is possible to subscribe to a free newsletter that informs recipients about changes in legal requirements.

2.4 INFORMATION REQUIRED FOR THE INVENTORY

In order to maintain a beneficial inventory, the database contains the following information for every requirement:

- Requirement type
(such as US DOD, EU, German Federal, State Rheinland-Pfalz, Health and Safety)
- Media area the requirement applies to
(such as 'Air Emissions', 'Hazardous Material (HM)', or 'Pollution Prevention', as defined in EMS Procedure # EMS_PBH_05 – Roles and Responsibilities)
- Aspect group(s) the requirement applies to
(such as 'Natural resource or raw material consumption or conservation', 'Spills to water or soil'. The aspect groups are defined in EMS Procedure # EMS_PBH_02 – Identification of Aspects, which also contains a listing of the aspects that belong to each group. Information on the aspects is necessary to comply with ISO 14001.)

- Title of requirement
(official title plus – if applicable – common abbreviation, such as ,*Vierte Verordnung zur Durchführung des Bundes-Immissionsschutzgesetzes – 4. BImSchV - Verordnung über genehmigungsbedürftige Anlagen*')
- English translation of title, if original title is not English
- Enactment date
- Source of requirement
(Location of current version of requirement, url)
- List of amendments
(only if requirement is not replaced by amendments, which applies for most EU requirements)
- Date of last amendment
(if possible year, month and day)
- Official Reference Number, if applicable
(such as AR 25-400-2)
- Database ID
(only when changing/removing existing datasets is required; needed for easy retrieval of the dataset)

2.5 DATABASE FEATURES

Refer to Appendix A for details on the database features.

2.6 INCORPORATION OF PERTINENT REQUIREMENTS

The media managers and supervisors of facilities, activities, products or services incorporate applicable legal and other environmental requirements into Standard Operating Procedures (SOPs) and environmental performance checklists and update these SOPs and checklists when legal and other requirements change. Upon request the DPW EMO will assist the media managers and supervisors in this effort. SOPs and checklists must be kept in compliance with EMS Procedure # EMS_PBH_09 – Document Control.

The DPW EMO takes into account legal and other requirements when providing input to requests for proposals and environmental reviews.

LIST OF APPENDICES

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APPENDIX A

Garrison-Wide Inventory of Legal and Other Requirements Database Functions

Database Functions

The garrison-wide inventory of legal and other requirements is maintained as an MSAccess database. Figure 1 shows the start window of the database. The start window lists those legal and other environmental requirements that apply to the garrison's activities, products, and services.

Title	English Translation	Aspect Groups	Media Areas
193 Gesetz zum Schutz vor schädlichen Bodenveränderungen und zur Sanierung von Altlasten – BBodSchG – Bundes-Bodenschutzgesetz	Law for the prevention of adverse impacts on soil and for the remediation of contaminated sites – Federal Soil Protection Law	Ecological resource degradation or conservation, Hazardous waste generation, Natural resource or raw material consumption or conservation,	Hazardous Materials (HM), Hazardous Waste (HW), Historical and cultural resources, Natural Resources, Soil and Groundwater
207 TRGS 524 – Sanierung und Arbeiten in kontaminierten Bereichen	Technical Rules for Hazardous Substances 524 – Remediation and Work on Contaminated Sites	Air emissions, Discharges to public sewer, ground or surface waters (point and non-point), Hazardous waste generation, Spills to water or soil	Hazardous Materials (HM), Soil and Groundwater Investigations and Remediation
257 BGI 583 – BG-Information "Biologische Arbeitsstoffe bei der Bodensanierung"	Information No 583 of the Occupational Professional Association (BG) concerning biological substances at soil remediation works"	Discharges to public sewer, ground or surface waters (point and non-point), Hazardous waste generation, Spills to water or soil	Soil and Groundwater Investigations and Remediation

Requirement Type: German Federal Requirement
 Official Reference Number: N/A
 Source of Requirement: https://www.umwelt-online.de/regelwerk/boden/bbsg_ges.htm

Enactment Date: 17 Mar 1998
 Last Amended: 09 Dec 2004

Requirement Type: German Federal Requirement
 Official Reference Number: N/A
 Source of Requirement: https://www.umwelt-online.de/regelwerk/trgs/trgs500/524_ges.htm

Enactment Date: Mar 1998
 Last Amended: N/A

Requirement Type: German Federal Requirement
 Official Reference Number: N/A
 Source of Requirement: https://www.umwelt-online.de/regelwerk/arbeits/uvv/bgi583_ges.htm

Enactment Date: Dec 1999
 Last Amended: N/A

Filter by Media Area: Soil and Groundwater Investigations and Remediation
 Keyword Search: Sanierung

Figure 1: Start window

In order to make the inventory list more convenient to the user, the database allows filtering by media area and to search by keyword:

- To filter the contents of the inventory by media area select the desired media area from the pull-down list (1)
- To search the inventory by keyword type in the keyword in 2 and push the button right of the text box (2).
- To clear the filter or keyword search, push the -button(s) next to the filter/search field(s)

To move through the displayed list, use the scroll bar (3) on the right hand side of the start window.

Select the -button (4) to view/edit the available information on a specific requirement. The form displayed in Figure 2 will open, then.

Figure 2: Requirement details form

In this form, all available information on a requirement is collected in fields ① to ⑧, plus – what is of special importance in order to **comply** with ISO 14001 – the environmental aspects, or precisely ‘aspect groups’² (⑨) with which the respective requirement is related are determined.

On the bottom right side of the form (⑩) those media areas for which the media managers confirmed the relevance of the respective requirements are listed.

In case there should be a need to modify some of the contained information:

- Use the pull-down menus ▾ (predefined entries), where available,
- Use the ✕-button to delete aspect groups or media areas that don’t fit, but don’t delete media areas for which you are not responsible.

Note: The database records who last modified the information on a specific requirement (⑪).



Additional requirements can be added to the inventory by using the ➤* -button which is available in the start window of the database (Figure 1 - ⑤). An empty form will open. The form works like the one displayed and described under Figure 2.

To print extracts of the inventory or the complete inventory:

- Go to the start window of the database
- Adjust the filter and keyword to your needs.
- Select the 📄 -button (Figure 1 - ⑦) to create an appropriate report.
- Print the report.

² For the relation between aspect groups and significant aspects, check EMS Procedure # EMS_PBH_02 (Aspect Assessment)
EMS_PBH_03

To export the inventory, or parts of it:

- Go to the start window of the database
- Adjust the filter and keyword to your needs.
- Select the -button (Figure 1 - ) to start the exporting process.
- Define where and under which name the Excel file shall be saved, and save the file.
- Open the Excel file from where you saved it.

Note: Due to the fact that MSExcel can not handle the aspect groups and media areas in the same way the database does, importing data from MSExcel to the database is not possible.